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20 *Co-Lead Counsel for Plaintiffs*

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23 **IN THE UNITED STATES DISTRICT COURT**  
24  
25 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

26 IN RE: UBER TECHNOLOGIES, INC.,  
27 PASSENGER SEXUAL ASSAULT  
28 LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**STIPULATION AND [PROPOSED]  
ORDER REGARDING MOTIONS  
CONCERNING WITNESS AND EXHIBIT  
LISTS**

This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
N.D. Cal. No. 23-cv-06708  
D. Ariz. No. 25-cv-4276

Judge: Honorable Charles R. Breyer  
Date: TBD  
Time: TBD  
Ctrm.: 6-17th Floor

WHEREAS, on December 12, 2025, Uber moved to strike Plaintiff's witness and exhibit lists [ECF 4659];

WHEREAS, on December 12, 2025, Uber moved to quash deposition notices of Gus Fuldner, Katy McDonald, and Sunny Wong [ECF 4653];

WHEREAS, on December 12, 2025, Plaintiff moved to preclude Uber from calling live

1 corporate witnesses at trial unless Uber agrees to produce Plaintiff's requested live corporate  
 2 witnesses as well, and, regardless, to preclude live testimony from Todd Gaddis and Chad Dobbs  
 3 [ECF 4654, 4656];

4 WHEREAS, the parties met and conferred and agreed that oppositions to the three motions  
 5 will be due December 17, 2025.

6 The parties agree and respectfully request the Court order that opposition to the three  
 7 motions identified above be filed by December 17, 2025. The parties further agree that no replies  
 8 are necessary and that the Court can decide all motions with or without holding any hearing.

9  
 10 **IT IS SO STIPULATED.**

11  
 12 Dated: December 12, 2025

Respectfully submitted,

13 By: /s/ Sarah R. London

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Dated: December 12, 2025

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RASIER, LLC, and RASIER-CA, LLC

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing.

Dated: December 12, 2025

/s/ Andrew R. Kaufman  
Andrew R. Kaufman

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-MD-03084-CRB (LJC)

**[PROPOSED] ORDER SETTING DEADLINE  
TO OPPOSE MOTIONS REGARDING  
WITNESS AND EXHIBIT LISTS**

This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
N.D. Cal. No. 23-cv-06708  
D. Ariz. No. 25-cv-4276

Having considered the parties' Stipulation, the Court orders as follows:

The parties will file oppositions to the motions filed at ECF 4653, 4654, and 4659 by  
December 17, 2025.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Charles R. Breyer  
United States District Judge